

**Exhibit A**

**Crumpler Declaration**

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., *et al.*<sup>1</sup>

Debtors.

x

: Chapter 11

:

: Case No. 22-11068 (JTD)

:

: (Jointly Administered)

:

:

:

:

x

**DECLARATION OF RUSSELL CRUMPLER IN SUPPORT OF THE MOTION OF THE  
FOREIGN REPRESENTATIVES FOR AUTHORIZATION TO FILE UNDER SEAL (A)  
MOTION FOR COORDINATION AMONG COURTS AND (B) MOTION OF THE  
JOINT LIQUIDATORS OF THREE ARROWS CAPITAL, LTD. FOR ENTRY OF AN  
ORDER (I) MODIFYING THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1)  
AND BANKRUPTCY RULE 4001 AND (II) GRANTING RELATED RELIEF**

1. I, Russell Crumpler, hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my knowledge and belief.

**Introduction**

2. I am a Senior Managing Director of Teneo (BVI) Limited in the British Virgin Islands (“BVI”). I, along with my colleague Christopher Farmer (also of Teneo (BVI) Limited) are the duly appointed joint liquidators and foreign representatives (together, the “Joint Liquidators”) of Three Arrows Capital Ltd. (“3AC”) by the Eastern Caribbean Supreme Court in the BVI High Court of Justice (Commercial Division) (“BVI Court”), Claim No. BVIHC (COM)

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2022/0117 and BVIHC (COM) 2022/119, pursuant to sections 159(1) and 162(1)(a) and (b) of the BVI Insolvency Act.

3. I respectfully submit this declaration in support of the Joint Liquidators' *Motion for Authorization to File Under Seal (A) Motion For Coordination Among Courts and (B) Motion of the Joint Liquidators of Three Arrows Capital, Ltd. for Entry of an Order (I) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362(D)(1) and Bankruptcy Rule 4001 and (II) Granting Related Relief*, to which this declaration is attached (the "**Seal Motion**").

4. I am over the age of 18, and I am duly authorized to make this declaration acting in my capacity as one of the Joint Liquidators of 3AC. Except as otherwise indicated, the facts set forth in this declaration are based upon my personal knowledge, my review of relevant documents, or my opinion based upon experience, knowledge, and information concerning 3AC. I am authorized to submit this declaration on behalf of 3AC, and if called upon to testify, I could and would testify competently to the facts set forth herein.

5. Except as otherwise indicated, all facts set forth in this declaration are based upon my personal knowledge or based upon my review of relevant documents.

### **Background**

6. I understand that the relief sought in the Seal Motion is this Court's authorization to file under seal the (a) *Motion of the Joint Liquidators of Three Arrows Capital, LTD. for Coordination Among Courts* (the "**Coordination Motion**") and (b) *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. for Entry of an Order (I) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362(D)(1) and Bankruptcy Rule 4001 and (II) Granting Related Relief* (the "**Lift Stay Motion**"), publicly with statements therein regarding certain claims being advanced before the BVI Court (as defined below) (such statements, the "**BVI Claims Information**") redacted, while

filling such motion unredacted under seal. [REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

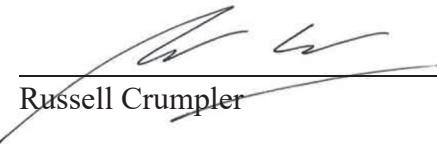
14. [REDACTED]

[REDACTED]

16. For the reasons described herein, I view the information in this declaration and the Coordination Motion as confidential information that would be harmful to the liquidation of 3AC and its creditors if such information became publicly available.

IN WITNESS WHEREOF, I have executed this declaration under penalty of perjury under the laws of the United States of America this 28<sup>th</sup> day of September 2023.

Dated: September 28, 2023



Russell Crumpler